

Rob G.H. McCausland  
1945 King William Road  
Virginia Beach, VA 23455

August 7, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Thank you for inviting comments in this matter. I am writing to encourage you to require that MVPDs must include any public, educational, and governmental access channels which they carry in the requirements for 1) onscreen channel guide indicators for closed-captioning programs for the deaf and hard-of hearing, and 2) audio descriptions of those programs in the onscreen channel guides for the visually impaired.

In this I support the comments filed previously by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; the National Association of Counties, National Association of Telecommunications Officers and Advisors, the U.S. Conference of Mayors, and Chicago Access Network Television.

I have been an active PEG TV access advocate (producer, board member, staff, director) for over 30 years. For more than 10 years I have maintained a database of public access television stations, currently listing some 2,000 U.S. PEG access providers and located at [Community Media Database](#), a website I launched in 2011 with pilot funding and support from the Benton Foundation and the New America Foundation.

With this background, let me share with you three specific kinds of common PEG access TV programs that should absolutely be included in these MVPD accessibility requirements: government meetings coverage; local election candidate interviews and debates, and local school sports.

Government Meeting Coverage: In 2010 I published results of a survey I did of all U.S. cities over 100,000 in population ("How many cities have access TV? More than you might think., New America Foundation). Of those 276 cities, 254 of them – 93% - carry their local government meetings on local cable channels – most of them access channels not managed by the cable companies. Those that are closed-captioned should certainly be included and designated in the on-screen channel guide as such, in order not to disadvantage the hard-of-hearing. They should *all* be audibly announced in the onscreen-program guide in order not to disadvantage the visually impaired.

Likewise, many PEG access channels carry the only television coverage in their communities of candidates for local elections – normally, candidate interviews and debates. Without audible descriptions of these programs in the MVPDs onscreen program guides, the visually impaired are left out of easily finding these programs.

The third type of programming that argues for audible announcements in the MVPDs onscreen channel guide is local sports. Why? Because, for the most part, these programs *already* have built-in audio descriptions - in their play-by-play voice-over commentaries.

Beyond these three types of local access TV programming, however, there is the larger reason - the over-arching service mission these channels provide: local community communications. Making it harder for the deaf and hard-of-hearing, and the blind and visually impaired to access these channels and thereby partake in the communities they serve and build is to send a harsh message that they have no place in the community. This can not have been the intention of Congress, and for that reason I trust you will see that these programs are included in your MVPD onscreen channel guide requirements.

Thank you for your kind consideration of these comments, and those of the dozens of PEG access TV providers across the country who have also filed.

Sincerely,

Rob McCausland